

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 23-00040

Hon. Jane M. Beckering

v

JOHN DAWOOD DALALY,

Defendant.

CHRISTOPHER M. O'CONNOR

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**MOTION FOR LEAVE TO FILE MOTION FOR DOWNWARD  
DEPARTURE AND/OR VARIANCE AND SENTENCING  
MEMORANDUM AND BRIEF IN SUPPORT UNDER RESTRICTED  
ACCESS**

NOW COMES the Defendant, JOHN DAWOOD DALALY, by and through his attorney, RAYMOND A. CASSAR, and pursuant to the Electronic Filing Policies and Procedures, seeks leave of this Court to file

Defendant's Motion for Downward Departure and/or Variance and Sentencing Memorandum and Brief in Support of Motion for Downward Departure and/or Variance under Restricted Access due to the sensitive, personal information contained therein.

For the foregoing reasons, the undersigned respectfully requests that this Court grant the leave sought in this Motion.

Respectfully Submitted,

s/ Raymond A. Cassar  
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